

1 RENE L. VALLADARES  
Federal Public Defender  
2 Nevada State Bar No. 11479  
KATHERINE TANAKA  
3 Assistant Federal Public Defender  
Nevada State Bar No. 14655C  
4 411 E. Bonneville, Ste. 250  
Las Vegas, Nevada 89101  
5 (702) 388-6577/Phone  
(702) 388-6261/Fax  
6 Katherine\_Tanaka@fd.org  
7 Attorney for Matthew Levi Blanchard

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**  
10

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 MATTHEW LEVI BLANCHARD,  
15 Defendant.

Case No. 2:20-mj-00465-BNW

**STIPULATION TO CONTINUE  
BENCH TRIAL**  
(First Request)

16  
17 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.  
18 Trutanich, United States Attorney, and Rachel Kent, Special Assistant United States Attorney,  
19 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,  
20 and Katherine Tanaka, Assistant Federal Public Defender, counsel for Matthew Levi Blanchard,  
21 that the bench trial currently scheduled on September 16, 2020, be vacated and continued to a  
22 date and time convenient to the Court, but no sooner than sixty (60) days.

23 This Stipulation is entered into for the following reasons:

24 1. Counsel for the defendant needs additional time to conduct investigation and  
25 complete research to determine whether there are any pretrial issues to be litigated and  
26 whether the case will ultimately go to trial or be resolved through negotiations.

2. The defendant is out of custody and does not object to the continuance.

3. The parties agree to the continuance.

This is the first request for a continuance of the bench trial.

DATED this 10 day of September, 2020.

RENE L. VALLADARES  
Federal Public Defender

NICHOLAS A. TRUTANICH  
United States Attorney

By/s/ Katherine Tanaka

By /s/ Rachel Kent

KATHERINE TANAKA  
Assistant Federal Public Defender

RACHEL KENT  
Special Assistant United States Attorney

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MATTHEW LEVI BLANCHARD,

Defendant.

Case No. 2:20-mj-00465-BNW

**FINDINGS OF FACT, CONCLUSIONS  
OF LAW AND ORDER**

**FINDINGS OF FACT**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Counsel for the defendant needs additional time to conduct investigation and complete research to determine whether there are any pretrial issues to be litigated and whether the case will ultimately go to trial or be resolved through negotiations.

2. The defendant is out of custody and does not object to the continuance.

3. The parties agree to the continuance

This is the first request for a continuance of the bench trial.

**CONCLUSIONS OF LAW**


The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for trial, taking into account the exercise of due diligence.

1 The continuance sought herein is excludable under the Speedy Trial Act, Title 18,  
2 United States Code, Section 3161(h)(7)(A), when the considering the facts under Title 18,  
3 United States Code, § 316(h)(7)(B)(iv).

4 **ORDER**

5 IT IS THEREFORE ORDERED that the bench trial currently scheduled on Wednesday,  
6 September 16, 2020, at 9:00 a.m., be vacated and continued to 11/25/2020 at the hour  
7 of 9:00 a.m.

8 DATED this 15 day of September, 2020.

9   
10 UNITED STATES MAGISTRATE JUDGE